

PAUL REYNOLDS CONSULTANT

August 22, 1993

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Greenville, AL 36037
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SEP 2 1993

Mr. William F. Caton,
Acting Secretary
FEDERAL COMMUNICATIONS COMMISSION
1919 M Street, N.W.
Room 222
Washington, D.C. 20554

FCC - MAIL ROOM

RE: Filing a Petition for Rule Making -
Alexander City, Alabama
West Point, Georgia

Dear Mr. Caton:

Enclosed please find the original and six duplicates that we wish to file for our client, Solar Broadcasting Company, Inc., licensee of WSTH(FM), Alexander City, Alabama. Solar is seeking a change in the city of license only. There is no filing fee for this petition until it is approved.


We respectfully request that your office route this petition to;

Michael Ruger, Chief
Allocations Branch
Policy and Rules Division
Mass Media Bureau

Additionally, there is a copy attached to an addressed and stamped envelope. This copy is labeled, "Receipt Stamp Copy." Please have someone receipt stamp this copy and return it to the petitioner for its records.

Thank you for your assistance in getting this petition filed.

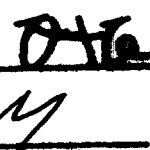
Sincerely,


Paul Reynolds,
Consultant

Enclosure(s)

BROADCAST CONSULTING AND CONSTRUCTION

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Before the
FEDERAL COMMUNICATIONS COMMISSION

Washington, D.C. 20554

SEP 2 1993

FCC - MAIL ROOM

In The Matter of

Amendment of Section 73.202(b),
 Table of Allotments,
 FM Broadcast Stations.
 (Alexander City, Alabama &
 West Point, GA)

)
)
)
)
)
)
)

MM Docket No. _____

RM No. _____

To: Chief, Allocations Branch
 Policy and Rules Division
 Mass Media Bureau

PETITION FOR RULE MAKING

Solar Broadcasting Company, Inc. ("Solar"), licensee of WSTH(FM), Alexander City, Alabama, hereby petitions the Commission to institute a Notice of Proposed Rule Making ("NPRM") leading to a change in the city of license of WSTH. Presently WSTH is licensed to Alexander City with co-owned WSTZ(AM). Alexander City is also served by WACD(AM).

Solar request that channel 291C1 be deleted at Alexander City and that the same channel be added to West Point, Georgia. It also request that its license be modified accordingly.

The attached engineering statement demonstrates that a change in the city of license of WSTH can be effectuated

without any relocation of its present transmitter/antenna site. The statement demonstrates that the current site and technical facility of WSTH is adequate to provide the required city grade signal over the entire city boundary of West Point.

The deletion of WSTH(FM) at Alexander City will not leave that community without local service. Alexander City will continue to be served by co-owned WTLM-AM and WACD(AM).

PETITION SUMMARIZED

The Solar Petition for Rule Making can be SUMMARIZED as follows:

| <u>CITY</u> | <u>Present</u> | <u>Proposed</u> |
|----------------|---------------------------------|---------------------------------|
| Alexander City | WSTH(FM) WTLM-AM WACD(AM) | WTLM-AM WACD(AM) |
| West Point | WCJM(FM) WPLV-AM | WCJM(FM) WPLV-AM WSTH(FM) |

MM DOCKET PRECEDENCE

The Commission has previously taken action on an identical PRM. In MM Docket 90-282, Dowdy Communications, Inc., (Dowdy) licensee of WYCT(FM), McComb, Mississippi, petitioned the Commission to delete channel 231C1 at McComb and add channel 231C1 at Kentwood, Louisiana. Dowdy requested that the license of WYCT be modified accordingly. At the time of the petition for rule making, no change in

the coordinates (tower/antenna location) was requested. The Commission subsequently granted the Dowdy request deleting channel 231C1 at McComb and substituting the same channel at Kentwood. It modified the license of WYCT accordingly.

Presently pending before the Commission in RM-7170 is a petition for rule making concerning the licensed facilities of WZFX(FM), Poplarville, Mississippi. The licensee, Dowdy and Dowdy Partnership, is proposing the deletion of channel 300C from Poplarville and substitution of its channel at Bay Saint Louis, Mississippi. This change in the city of license involves no change in its technical facilities. Bay Saint Louis presently has local service from WBSL-AM, which is another similarity to the instant Solar petition request.

EXPRESSION OF INTEREST

Solar hereby states that if the Commission acts favorably on its request to change the city of license from Alexander City, Alabama, to West Point, Georgia, it will immediately file a Form 301 seeking a modification of its license to conform to the Final Report and Order in the instant Docket.

VERIFICATION

I, Allen Woodall, Jr., President of Solar Broadcasting Company, Inc. do hereby verify that Solar is the licensee of WSTH(FM), Alexander City, Alabama, and that all statements made in this petition for rule making are true and factual to the best of my knowledge and belief. This petition is not made for the purpose of impending, obstructing, or delaying determination on any other application, or petition, with which it may be in conflict. The statements made herein are made in good faith.

CONCLUSION

Solar Broadcasting Company, Inc., licensee of WSTH(FM), Alexander City, Alabama, is by the instant Petition for Rule Making, making request to the Commission to delete channel 291C1 at Alexander City and substitute the same channel at West Point, Georgia. It also request that the license of WSTH be modified accordingly. This change in the city of license requires no movement in the present technical facilities of WSTH.

Therefore, Solar request that the Commission issue a Notice of Proposed Rule Making for the amendment to the Table of Allotments as sought in this petition and the accompanying engineering statement.

Respectfully Submitted,
SOLAR BROADCASTING COMPANY, INC.

By: 

Allen Woodall, Jr.
Its President

Allen Woodall, Jr.
Solar Broadcasting Company, Inc.
1236 Broadway
Columbus, GA 31994

(706) 596-5100

ENGINEERING STATEMENT

IN SUPPORT OF A

PETITION FOR RULE MAKING

DELETING CHANNEL 291C1 @ ALEXANDER CITY, ALABAMA

SUBSTITUTING CHANNEL 291C1 @ WEST POINT, GEORGIA

SOLAR BROADCASTING COMPANY, INC.

GENERAL

The instant engineering statement is offered in support of a petition for rule making being submitted by Solar Broadcasting Company, Inc. (Solar), licensee of WSTH(FM), Alexander City, Alabama. Presently WSTH operates on channel 291C1 with a maximum class C1 facility. In the PRM, Solar is requesting that the Commission delete channel 291C1 at Alexander City and substitute channel 291C1 at West Point, Georgia, without any technical change in the present WSTH transmitting facilities. It is also requesting that the license of WSTH be modified to reflect this change.

The deletion of channel 291C1 at Alexander City does not leave the community without local service. Co-owned AM station WSTZ and WACD-AM both are licensed to Alexander City and provide the required AM city grade signal (5 Mv/m) to the entire community.

ALLOCATIONS STUDY

Exhibit E, Figure 1 is an allocations study using the present licensed coordinates of WSTH as reference. Since there is no proposed change in the transmitting site of WSTH, the allocation of this channel is obviously no problem. However, the reference coordinates for the community of West Point are also included. The study determined that the distance from West Point to the WSTH transmitter is 29.99 kilometers. The normal city grade contour for a maximum facility class C1 is 50 kilometers. Therefore, from a theocratical perspective, WSTH will more than adequately provide the required 70 dBu service to West Point.

70 DBU SERVICE TO WEST POINT

In order to completely verify the required city grade coverage to West Point, a complete terrain and contour study was conducted with a city of license radial. A standard NGDC 30 Second terrain data base was used with radials every 15° (Degrees). However, the terrain averaging used only the eight cardinal radials. A ninth radial, 63° (Degrees) was chosen as the "city of license" radial. Since it was not a cardinal radial it was not averaged. When an antenna height

of 299 meters HAAT was used, the CORAMSL was found to be the same as that shown on the WSTH license (524 meters). This study and its results are shown in Exhibit E, Figure 2.

Using the results of the terrain study, a study depicting the 70 contour was conducted with a radial every 10° (Degrees) plus the eight cardinal radials. The 63° radial through West Point was also included. The results of this study is shown in Exhibit E, Figure 3.

A 1:2,500,000 scale USGS United States (Counties & County Seats) map was enlarged to a 1:1,000,000 scale. This map was used to depict a computer generated 70 dBu contour reflecting the results in Exhibit E, Figure 4. The city boundaries of West Point were taken from a 7.5 minute topographical map of the area and carefully plotted on the contour map. The relationship of the present WSTH site location, the city boundaries and the present 70 dBu contour are shown in Exhibit E, Figure 4. There is a wide area beyond the city boundaries before the 70 dBu contour is reached.


CONCLUSION

It has been demonstrated that channel 291C1 can be deleted at Alexander City, Alabama, and substituted at West Point, Georgia, in keeping with the Commission's Rules for separations and providing a city grade contour to all of the city of license. The allocation of channel 291C1 at West Point does not leave Alexander City without local service. Two local AM stations, licensed to Alexander City will continue to provide community service.

The instant petition for rule making is a request for change in city of license only. No other changes need be considered.

CERTIFICATION

I, Paul Reynolds, hereby certify the following: that I am an independent broadcast consultant; that I hold a Bachelor of Science degree in Communications from the University of Southern Mississippi and have completed work for a Masters Degree in Communications from the University of Alabama. I have been a practicing consultant since 1980, and I am familiar with the Commission's rules and regulations. I have filed numerous petitions and applications in association with Amerimedia, Inc., and my qualifications are known in the industry and at the Commission. I have been retained by Solar Broadcasting Company, Inc. to prepare this Engineering Statement in support of a Petition for Rule Making (seeking a change in the city of license only) for WSTH(FM). All information in this engineering statement was prepared by me.

Signed 
PAUL REYNOLDS, CONSULTANT

THIS 22nd DAY OF AUGUST, 1993

415 NORTH COLLEGE STREET
GREENVILLE, ALABAMA 36037
(205) 382-8048

ENGINEERING STATEMENT

IN SUPPORT A

PETITION FOR RULE MAKING

DELETING CHANNEL 291C1 @ ALEXANDER CITY, ALABAMA
SUBSTITUTING CHANNEL 291C1 @ WEST POINT, GEORGIA

SOLAR BROADCASTING COMPANY, INC.

ALLOCATION STUDY

[USING LICENSED SITE OF WSTH AS REFERENCE]

| 32 45 33 N. 85 28 04 W. | | | Class C1 Current rules spacings Channel 291 -106.1 MHz | | | | Search Date 08-22-93 |
|---|-------|-------------|--|-------|--------|-------|-------------------------|
| Call | Ch# | City | State | Bear' | Dist' | R'grd | Margin |
| Community of West Point 32° 53' 00" 85° 11' 00" | | | GA | 62.7 | 29.99 | | * |
| WSTHFM 291C1 Alexander City Of No Concern Licensed Site of Petitioner | | | AL | 0.0 | 0.00 | 245.0 | -245.00 * |
| WKMK.C 291A | | Sylvester | GA | 133.8 | 201.09 | 200.0 | 1.09 * |
| WQBZ | 292C2 | Fort Valley | GA | 90.0 | 161.26 | 158.0 | 3.26 * |
| WZHT | 289C | Troy | AL | 217.0 | 108.76 | 105.0 | 3.76 * |
| AP288 | 288A | Bowdon | GA | 10.7 | 79.92 | 75.0 | 4.92 * |
| AP288 | 288A | Bowdon | GA | 10.7 | 80.04 | 75.0 | 5.04 * |
| ALOPEN | 288A | Bowdon | GA | 9.4 | 81.21 | 75.0 | 6.21 * |
| WYAM.A 291C3 | | Hartselle | AL | 330.0 | 218.16 | 211.0 | 7.16 * |
| AD237 | 237A | Valley | AL | 52.7 | 29.43 | 22.0 | 7.43 * |
| ALOPEN | 291C3 | Hartselle | AL | 328.5 | 220.25 | 211.0 | 9.25 * |
| AD290 | 290A | Montezuma | GA | 110.6 | 144.72 | 133.0 | 11.72 |
| WWIV.C 290A | | Trussville | AL | 307.6 | 145.53 | 133.0 | 12.53 |
| WLET | 291C | Toccoa | GA | 40.0 | 285.12 | 270.0 | 15.12 |
| WRHY.C 290A | | Centre | AL | 350.0 | 162.71 | 133.0 | 29.71 |
| WYAM.C 291A | | Hartselle | AL | 325.9 | 230.63 | 200.0 | 30.63 |

EXHIBIT
Figure

ENGINEERING STATEMENT

IN SUPPORT A

PETITION FOR RULE MAKING

DELETING CHANNEL 291C1 @ ALEXANDER CITY, ALABAMA
SUBSTITUTING CHANNEL 291C1 @ WEST POINT, GEORGIA

SOLAR BROADCASTING COMPANY, INC.

NGDC 30 Sec. Data

TERRAIN AVERAGING STUDY

[USING LICENSED SITE OF WSTH AS REFERENCE]

North Latitude: 32-45-33
West Longitude: 85-28-04

The antenna is calculated to be at 1719.4 feet (524.1 m.) AMSL.

| <u>AZIMUTH</u> | <u>AVERAGE TERRAIN</u> | <u>ANTENNA HEIGHT</u> |
|---|--------------------------------------|-----------------------------|
| * 0.0°: | 787.1 feet (239.9 meters), A. A. T. | 932.3 feet (284.2 meters) |
| 15.0°: | 820.7 feet (250.2 meters), A. A. T. | 898.7 feet (273.9 meters) |
| 30.0°: | 788.8 feet (240.4 meters), A. A. T. | 930.6 feet (283.7 meters) |
| * 45.0°: | 781.8 feet (238.3 meters), A. A. T. | 937.7 feet (285.8 meters) |
| 60.0°: | 755.4 feet (230.2 meters), A. A. T. | 964.0 feet (293.8 meters) |
| **63.0°: | 745.7 feet (227.3 meters), A. A. T. | 973.7 feet (296.8 meters). |
| 75.0°: | 732.5 feet (223.3 meters), A. A. T. | 986.9 feet (300.8 meters) |
| * 90.0°: | 798.9 feet (243.5 meters), A. A. T. | 920.5 feet (280.6 meters) |
| 105.0°: | 769.9 feet (234.7 meters), A. A. T. | 949.5 feet (289.4 meters) |
| 120.0°: | 802.1 feet (244.5 meters), A. A. T. | 917.4 feet (279.6 meters) |
| *135.0°: | 773.2 feet (235.7 meters), A. A. T. | 946.3 feet (288.4 meters) |
| 150.0°: | 733.3 feet (223.5 meters), A. A. T. | 986.1 feet (300.6 meters) |
| 165.0°: | 724.9 feet (220.9 meters), A. A. T. | 994.6 feet (303.1 meters) |
| *180.0°: | 691.9 feet (210.9 meters), A. A. T. | 1027.6 feet (313.2 meters) |
| 195.0°: | 693.5 feet (211.4 meters), A. A. T. | 1025.9 feet (312.7 meters) |
| 210.0°: | 684.9 feet (208.8 meters), A. A. T. | 1034.5 feet (315.3 meters) |
| *225.0°: | 651.9 feet (198.7 meters), A. A. T. | 1067.6 feet (325.4 meters) |
| 240.0°: | 667.8 feet (203.5 meters), A. A. T. | 1051.7 feet (320.6 meters) |
| 255.0°: | 712.7 feet (217.2 meters), A. A. T. | 1006.7 feet (306.8 meters) |
| *270.0°: | 682.4 feet (208.0 meters), A. A. T. | 1037.0 feet (316.1 meters) |
| 285.0°: | 718.5 feet (219.0 meters), A. A. T. | 1001.0 feet (305.1 meters) |
| 300.0°: | 726.8 feet (221.5 meters), A. A. T. | 992.6 feet (302.6 meters) |
| *315.0°: | 740.7 feet (225.8 meters), A. A. T. | 978.7 feet (298.3 meters) |
| 330.0°: | 767.2 feet (233.9 meters), A. A. T. | 952.2 feet (290.2 meters) |
| 345.0°: | 748.5 feet (228.1 meters), A. A. T. | 970.9 feet (295.9 meters) |
| Average of 8 : 738.5 feet (225.1 meters); HAAT | | 981.0 ft (299.0 meters). |

* ONLY EIGHT CARDIANL RADIALS USED IN AVERAGING

** RADIAL THROUGH PROPOSED CITY OF LICENSE (WEST POINT, GA)
[NOT INCLUDED IN TERRAIN AVERAGING]

EXHIBIT
Figure

ENGINEERING STATEMENT

IN SUPPORT A

PETITION FOR RULE MAKING

DELETING CHANNEL 291C1 @ ALEXANDER CITY, ALABAMA
SUBSTITUTING CHANNEL 291C1 @ WEST POINT, GEORGIA

SOLAR BROADCASTING COMPANY, INC.

CONTOUR STUDY

[USING PRESENT LICENSED SITE OF WSTH AS REFERENCE]

Reference Coordinates:

32° 45' 33"

85° 28' 04"

ERP = 100 kW

FM - 2-6 Tables

| Azimuth 'T. | Ave. Elev. 3 to 16 km Meters AMSL | Effective Antenna Height Meters AAT | ERP (dBk) | F(50-50) Distance to 60 dBu Contour km | F(50-50) Distance to 70 dBu Contour km |
|----------------|---|---|--------------|---|---|
| * 0 | 239.9 | 284.1 | 20.000 | 71.1 | 49.0 |
| 10 | 244.5 | 279.5 | 20.000 | 70.7 | 48.7 |
| 20 | 252.1 | 271.9 | 20.000 | 70.1 | 48.2 |
| 30 | 240.4 | 283.6 | 20.000 | 71.1 | 49.0 |
| 40 | 236.1 | 287.9 | 20.000 | 71.4 | 49.3 |
| * 45 | 238.3 | 285.7 | 20.000 | 71.2 | 49.1 |
| 50 | 235.1 | 288.9 | 20.000 | 71.5 | 49.3 |
| 60 | 230.2 | 293.8 | 20.000 | 71.9 | 49.7 |
| ** 63 | 227.3 | 296.7 | 20.000 | 72.1 | 49.9 |
| 70 | 217.8 | 306.2 | 20.000 | 72.9 | 50.5 |
| 80 | 229.6 | 294.4 | 20.000 | 71.9 | 49.7 |
| * 90 | 243.5 | 280.5 | 20.000 | 70.8 | 48.8 |
| 100 | 238.1 | 285.9 | 20.000 | 71.2 | 49.1 |
| 110 | 238.3 | 285.7 | 20.000 | 71.2 | 49.1 |
| 120 | 244.5 | 279.5 | 20.000 | 70.7 | 48.7 |
| 130 | 239.9 | 284.1 | 20.000 | 71.1 | 49.0 |
| * 135 | 235.7 | 288.3 | 20.000 | 71.4 | 49.3 |
| 140 | 230.5 | 293.5 | 20.000 | 71.9 | 49.7 |
| 150 | 223.5 | 300.5 | 20.000 | 72.4 | 50.1 |
| 160 | 221.0 | 303.0 | 20.000 | 72.6 | 50.3 |
| 170 | 221.7 | 302.3 | 20.000 | 72.6 | 50.2 |
| * 180 | 210.9 | 313.1 | 20.000 | 73.4 | 51.0 |
| 190 | 209.0 | 315.0 | 20.000 | 73.5 | 51.1 |
| 200 | 212.8 | 311.2 | 20.000 | 73.2 | 50.8 |
| 210 | 208.8 | 315.2 | 20.000 | 73.5 | 51.1 |
| 220 | 204.6 | 319.4 | 20.000 | 73.8 | 51.4 |
| * 225 | 198.7 | 325.3 | 20.000 | 74.3 | 51.8 |
| 230 | 202.6 | 321.4 | 20.000 | 74.0 | 51.5 |
| 240 | 203.5 | 320.5 | 20.000 | 73.9 | 51.4 |

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EXHIBIT E
Figure 3

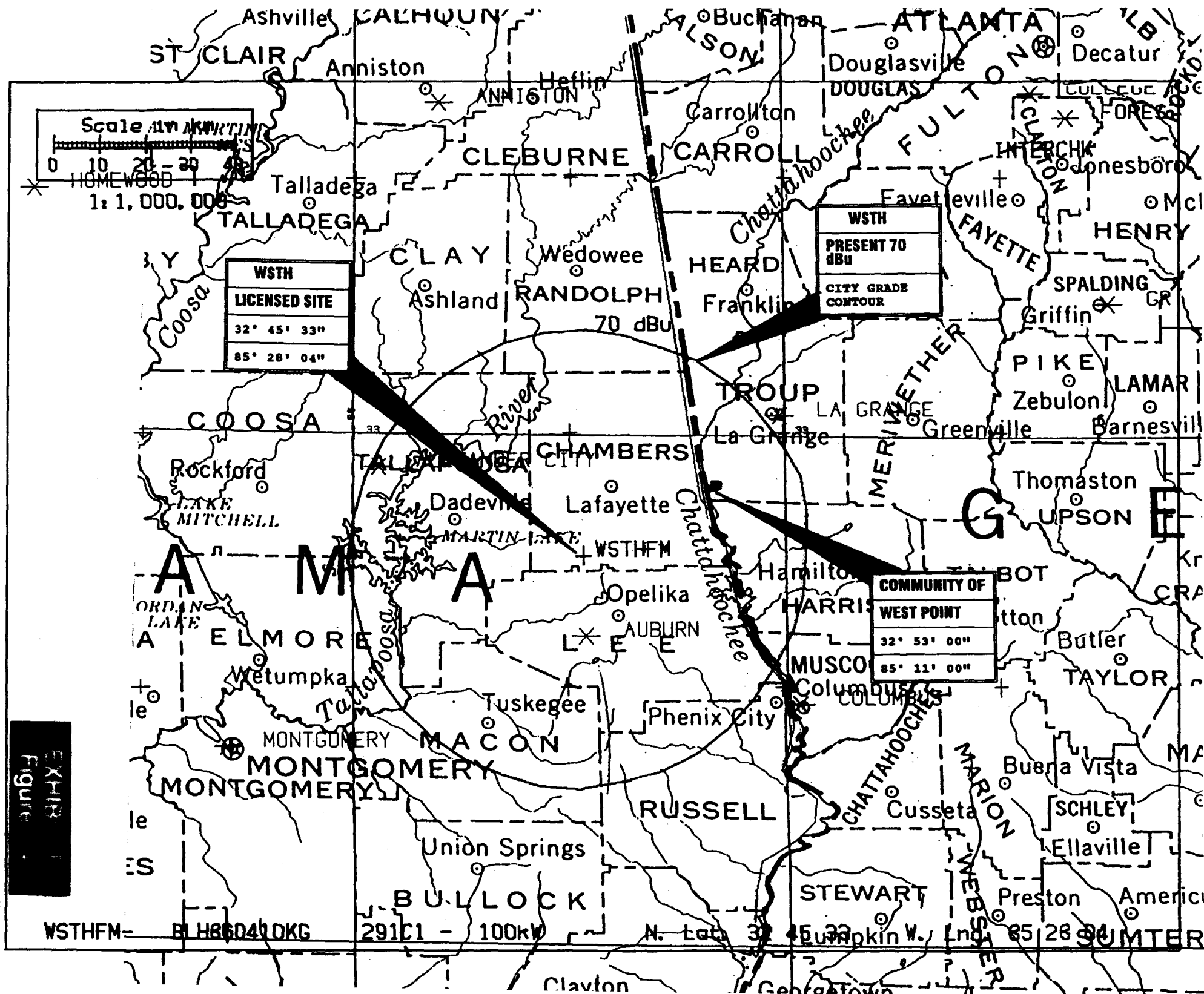
| | | | | | |
|-------|-------|-------|--------|------|------|
| 250 | 213.4 | 310.6 | 20.000 | 73.2 | 50.8 |
| 260 | 215.5 | 308.5 | 20.000 | 73.0 | 50.7 |
| * 270 | 208.0 | 316.0 | 20.000 | 73.6 | 51.1 |
| 280 | 215.6 | 308.4 | 20.000 | 73.0 | 50.6 |
| 290 | 217.4 | 306.6 | 20.000 | 72.9 | 50.5 |
| 300 | 221.5 | 302.5 | 20.000 | 72.6 | 50.3 |
| 310 | 225.2 | 298.8 | 20.000 | 72.3 | 50.0 |
| * 315 | 225.8 | 298.3 | 20.000 | 72.2 | 50.0 |
| 320 | 227.5 | 296.5 | 20.000 | 72.1 | 49.9 |
| 330 | 233.9 | 290.1 | 20.000 | 71.6 | 49.4 |
| 340 | 231.9 | 292.1 | 20.000 | 71.8 | 49.6 |
| 350 | 233.9 | 290.1 | 20.000 | 71.6 | 49.4 |

Ave. = 225.1 M 299.0 M

Antenna Radiation Center AMSL = 524.0 M

* ONLY EIGHT CARDINAL RADIALS USED IN AVERAGING

** RADIAL THROUGH PROPOSED CITY OF LICENSE (WEST POINT, GA)
[NOT INCLUDED IN ANY AVERAGING]



EXHIB
Figure 1